

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : INFORMATION

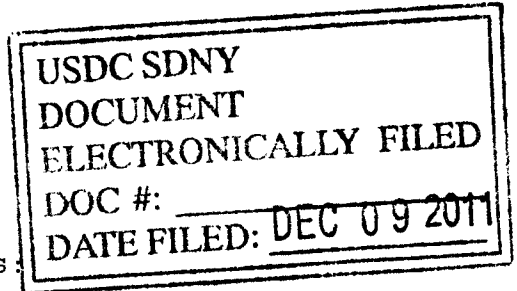
- v. - : S2 10 Cr. 923 (DLC)

ZUBAIR TAHIR, :  
 :  
. Defendant. :

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COUNT ONE

The United States Attorney charges:



1. From at least in or about August 2006 up to and including in or about February 2008, in the Southern District of New York and elsewhere, ZUBAIR TAHIR, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Section 1343 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that ZUBAIR TAHIR, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing

such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

OVERT ACT

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about January 31, 2008, shortly after a straw buyer ("SB-1") purchased a property located at 60 Webster Avenue, Unit 201, Jersey City, New Jersey from ZUBAIR TAHIR, the defendant, TAHIR arranged for SB-1 to receive approximately \$20,000 in cash in New Jersey.

(Title 18, United States Code, Section 1349.)

COUNT TWO

The United States Attorney further charges:

4. From at least in or about August 2006 up to and including in or about February 2008, in the Southern District of New York and elsewhere, ZUBAIR TAHIR, the defendant, unlawfully, willfully and knowingly, and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations prescribed under that section, did cause and attempt to cause a domestic financial institution, to wit, a check-cashing company in New Jersey, to fail to file reports required under Title 31, United States Code, Section 5313(a) and the regulations prescribed under that section, and

did so while violating other laws of the United States, to wit, TAHIR caused checks to be cashed at the check-cashing company in New Jersey that were valued at, or slightly less than, \$10,000 in order to evade the currency transaction reporting requirements and while attempting to conceal payments made in furtherance of the conspiracy charged in Count One.

(Title 31, United States Code, Sections 5324(a)(1) & (d)(2);  
Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Information, ZUBAIR TAHIR, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and 982 and Title 28, United States Code, Section 2461, any property constituting and derived from proceeds obtained directly and indirectly as the result of the offense alleged in Count One of this Information, including, but not limited to, a sum of United States currency equal to approximately \$3,046,869, in that such sum in aggregate represents the approximate proceeds obtained as a result of the offense alleged in Count One of this Information.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of ZUBAIR TAHIR, the defendant:


- a. cannot be located upon the exercise of due

diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;  
or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of ZUBAIR TAHIR, the defendant, up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 & 982, Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461.)

  
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PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

ZUBAIR TAHIR,

Defendant.

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INFORMATION

S2 10 Cr. 923 (DLC)

(Title 18, United States Code,  
Sections 1349 and 2; Title 31,  
Section 5324.)

PREET BHARARA

United States Attorney.

12/9/10  
Pld Inf + Waiver of Fed  
AUSA Dan Goldman pres, De  
Zubair Tahir pres w/ Atty Joshua  
Proctor, Counsel to Robert M  
Abel, Dkt Clerk, Gupta ET # 1+2  
of Inf Bail Cont.  
Mag Judge  
Robinson